

1 ROBERT S. MUELLER, III (CSBN 59775)  
2 United States Attorney

ORIGINAL  
FILED

AUG 30 2001

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11  
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ROBBY ROSS,

16 Defendant.  
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No. **CR01-40145 CW**

VIOLATIONS: 18 U.S.C. § 2251(a) –  
Sexual Exploitation of Children; 18 U.S.C. §  
2252A(a)(1) – Transportation of Child  
Pornography; 18 U.S.C. § 2423(b) – Travel  
With Intent to Engage in Sexual Act With a  
Juvenile; 18 U.S.C. § 2423(a) –  
Transportation of Minor With Intent To  
Engage In Criminal Sexual Act

OAKLAND VENUE

19  
20 INDICTMENT

21 The Grand Jury charges:

22 COUNT ONE: (18 U.S.C. § 2251(a) – Sexual Exploitation of Children)

23 On or about and between June 2000 and September 19, 2000, both dates being  
24 approximate and inclusive, in the Northern District of California, and elsewhere, the defendant  
25 **ROBBY ROSS**  
26 did knowingly employ, use and persuade Jane Doe Number One to take part in sexually explicit  
27 conduct for the purpose of producing a visual depiction of such conduct, namely an 8 mm  
28 videotape, which was then transported across state lines, in violation of Title 18, United States

INDICTMENT

Code, Section 2251(a).

COUNT TWO: (18 U.S.C. § 2252A(a)(1) – Transportation of Child Pornography)

On or about and between June 2000 and September 19, 2000, both dates being approximate and inclusive, in the Northern District of California, and elsewhere, the defendant

ROBBY ROSS

did knowingly transport child pornography in interstate commerce, namely an 8 mm videotape of Jane Doe Number One engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT THREE: (18 U.S.C. § 2423(b) – Travel With Intent to Engage in Sexual Act With a Juvenile)

On or about and June 2000 and September 19, 2000, both dates being approximate and inclusive, in the Northern District of California, and elsewhere, the defendant

ROBBY ROSS

did knowingly travel in interstate commerce for the purpose of engaging in a sexual act with a person under 18 years of age that, if committed in the special maritime and jurisdiction of the United States, would be a violation of Title 18, United States Code, Section 2243(a), namely, the defendant knowingly engaged in a sexual act with Jane Doe Number One who was 14 years old, and who was at least four years younger than the defendant, in violation of Title 18, United States Code, Section 2423(b).

COUNT FOUR: (18 U.S.C. § 2423(a) – Transportation of Minor With Intent To Engage In Criminal Sexual Act)

On or about August 2000, in the Northern District of California, and elsewhere, the defendant

ROBBY ROSS

did knowingly transport Jane Doe Number Two, who was 12 years of age, across state lines and in interstate commerce, with the intent that Jane Doe Number Two

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INDICTMENT

engage in prostitution and sexual activity for which a person could be charged with a criminal offense, in violation of Title 18, United States Code, Section 2423(a).

DATED:

A TRUE BILL.

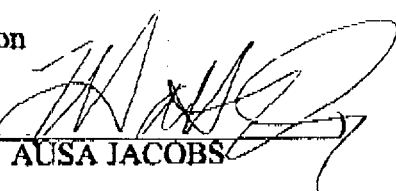
FOREPERSON

ROBERT S. MUELLER, III  
United States Attorney



DAVID W. SHAPIRO  
Chief, Criminal Division

(Approved as to form:

  
AUSA JACOBS

INDICTMENT